

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JAMES GH AISAR, et al.

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 1:19-cv-01224

**PLAINTIFFS' WITNESS LIST**

Plaintiffs, through undersigned counsel, hereby respectfully submit their list of potential witnesses for trial in the above-captioned matter. In accordance with Rule 26(a)(3) of the Federal Rules of Civil Procedure, the witnesses marked with an asterisk are those Plaintiffs expect to call at trial. The additional witnesses listed below are those Plaintiffs may call if the need arises. Plaintiffs reserve the right to seek to present the testimony of such witnesses through discovery deposition testimony if the witness is unavailable for trial. Plaintiffs reserve the right to amend this list if further developments arise in this litigation.

**WITNESSES**

1. James Ghaisar\*
2. Kelara Ghaisar\*
3. Negeen Ghaisar\*
4. Kouros Emami\*
5. Alejandro Amaya\*
6. Lucas Vinyard\*
7. Daniel Gohn\*

8. Bryant Hartzell
9. Colonel Edwin Roessler
10. Robert MacLean\*
11. Anne Rizzo
12. Brian Joseph D'Cruz
13. Atif Rehman
14. Maria Casey
15. John Dillon
16. Urey Patrick
17. Dr. Stan Smith
18. Anthony McSherry
19. Brian Humbertson
20. Christine Garcia
21. Justin Henderson
22. Andrew Kellogg
23. Jacob Sipe
24. John Yang
25. Ryan Lazisky
26. Jeff Caesar
27. Kyle Groom
28. Idean Marvastian
29. Sam Yeganeh

30. Any witness necessary to authenticate records and/or establish the matter in which records were kept.
31. Any other witnesses designated by Defendant to whom Plaintiffs do not object.
32. Witnesses that may become necessary for rebuttal testimony.

Dated: August 20, 2020

Respectfully submitted,

/s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)

Roy L. Austin, Jr. (*pro hac vice*)

HARRIS, WILTSHIRE & GRANNIS LLP

1919 M Street NW, 8th Floor

Washington, D.C. 20036

Telephone: 202-730-1300

tconnolly@hwglaw.com

raustin@hwglaw.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will serve notice of such filing upon all parties and counsel of record.

/s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)  
HARRIS, WILTSHIRE & GRANNIS LLP  
1919 M Street NW, 8th Floor  
Washington, D.C. 20036  
Telephone: 202-730-1300  
tconnolly@hwglaw.com